

# ENSV Inspection Transmittal Summary Report

**Media:**

RCRA

**Inspection Type:**

CEI

**Inspection Date:**

02/04/2010

**Transmittal Date:****Preliminary SNC Findings:**

No

**NOV / NOPV / NOPF:**

Yes

**Inspector:**

Dave Whiting

**Facility Name:**

A-TEC Recycling

**Address:**

5745 NE 17th Street

Des Moines

IA

**ID Number:**

IA0000109827

**Activity Number:****MM Participating Programs:****Federal Activity:**

Universal Waste destination facility - LAMP RECYCLER

**Federal Facility:**

No

**Potential EJ:**

No

**SBREFA Provided:** Yes **Security Handout Provided:** Yes **MM Screening Completed:** Yes **EMS ISO 14001:** No **Compliance Officer:** Edwin Buckner**Selection Criteria 1:**

Bulb Recyclers

**Selection Criteria 2:****ACS Code:****Inspection Findings:**

2 citations:

UW lamp containers (~200) not closed.

UW battery containers (2) not marked.

**Comments:****Target Quality:**

OK- identified a couple of problems; 1 endemic, which needs a mgmnt practice change.

497262



RCRA

A601

JFH 2/22/10

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2/24/10  
3/3/10



# Inspector Worksheet

Inspector: Dave Whiting

Facility Name: A-TEC Recycling

Media: RCRA

Federal Facility: ☐ Yes

Address: 5745 NE 17th Street

City: Des Moines

State: IA

ZIP:

County:

Facility Activity: Universal Waste destination facility - LAMP RECYCLER	Inspection Type: CEI	Selection Criteria - 1: Bulb Recyclers	Selection Criteria - 2:
ID Number: IA0000109827	Activity #:	NAICS/SIC Code:	Compliance Officer: Edwin Buckner
Quarter Requested: Any Quarter	Quarter: 2	Fiscal Year: 2010	Last Inspection: 04/14/1999 Planned Inspection: 02/03/2010

Major or Minor:	ACS Code:	Forward Copy of MMSC to:	Comments:
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FF Commitment Comments:	Federal Facility Program Commitment:
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## Reason For Inspection:

This facility recycles universal waste lamps. Examine how they manage the lamps during transport and throughout the process. Is there opportunity for spills? Fugitive material? What do they do with recovered Hg?

Determine how the facility handles lamps broken during transit in the trailers.

\*\*\*\* All information below is required and must be completed by the Inspector \*\*\*\*

Actual Inspection 2/4/10	Report Transmittal	Report Completion 2/18/10		
Potential EJ <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Preliminary SNC Findings <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	NOV/NOFF Issued <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Security Handout Provided <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	SBREFA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
MM Type	MM Level	MM Participating Program *	* A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA, U=UST, C=CFC, U-I=UIC, Wet, PWS, All	
MM Screening Complete?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	ALL <input type="checkbox"/> CAA <input type="checkbox"/> E/T <input type="checkbox"/> EMS <input type="checkbox"/> CFC <input type="checkbox"/> RCRA <input type="checkbox"/> ISO 14001		
MM Screening Forwarded?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If Yes, who? →	CWA <input type="checkbox"/> UST <input type="checkbox"/> UIC <input type="checkbox"/> PWS <input type="checkbox"/> EJ <input type="checkbox"/> SPCC <input type="checkbox"/> Wetlands	

Inspection Findings and Comments: (briefly list regulatory concerns or other compliance issues)

Citations:  
UW lamp containers (~200) not closed.  
UW battery containers (2) not marked.

Target Quality (Good / Bad - Why?)

OK - identified a couple problems; 1 endemic, which needs a mgmt practice change.

\*\*\*\* For Contractor Inspections Only \*\*\*\*

Contracting Officer:	Date of First Draft	Date of Final Report
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# Inspector Worksheet

Inspector: Dave Whiting

## **REPORT OF RCRA COMPLIANCE INSPECTION**

At

### **A-TEC RECYCLING INCORPORATED**

5745 NE 17<sup>th</sup> Street

Des Moines, IA 50313

Phone No.: (515) 244-7357

EPA I.D. NUMBER: IA0000109827

On

February 4, 2010

By

### **U.S. ENVIRONMENTAL PROTECTION AGENCY**

Region VII

Environmental Services Division

## **INTRODUCTION**

At the request of the Air and Waste Management Division (AWMD), a RCRA Compliance Evaluation Inspection (CEI) was performed at A-TEC Recycling, Inc. in Des Moines, IA on February 4, 2010. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The inspection was a Level B Multi-Media Inspection. A Multi-Media Screening checklist is attached to this report (attachment 1). This narrative report and attachments present the results of the CEI.

## **PARTICIPANTS**

A-TEC Recycling, Inc. (A-TEC)

Larry Young, Co-Owner and President

Chris Dennis, Branch General Manager

U.S. Environmental Protection Agency (EPA):

David N. Whiting, Environmental Engineer

## **INSPECTION PROCEDURE**

Upon arrival at A-TEC I contacted Mr. Young and presented him my credentials. I explained to Mr. Young the purpose of the CEI and procedure I would follow. I also discussed the confidentiality of business information with him. I explained to Mr. Young my need to collect accurate information and left with him a copy of U.S. Federal Code Sections 1001 & 1002. The inspection consisted of a

discussion of facility operations, and waste management practices, a review of pertinent documents, and a visual inspection of waste storage areas. I was accompanied by Mr. Young during the visual examination of the facility. Information collected during the CEI is recorded on data gathering sheets, which are referenced in the report. Photographs taken during the CEI are attached as inspection documentation (attachment 10). A photo log is included (attachment 9). At the conclusion of the inspection I had an exit briefing with Mr. Young. During the exit briefing, Mr. Young acknowledged receipt of the following by his signature: a Notice of Violation, an Inspection Confidentiality Notice and a Receipt for Documents (attachments 2-4). No claim for confidential treatment of information was made during the CEI.

## **FACILITY DESCRIPTION**

A-TEC is primarily involved in the activity of collecting and recycling (processing) spent lamps. These include both fluorescent and high intensity discharge (HID) type lamps. Mr. Young said that collecting and processing spent lamps comprises over 90% of their business activity. The spent lamps may be collected by A-TEC drivers or delivered to A-TEC by other transporters. The processing of spent lamps involves: crushing the lamps, separating them into individual components, and managing each waste component individually. A-TEC also collects waste lighting fixture ballasts, universal waste batteries and universal waste mercury containing equipment, which are shipped off-site to a designated facility without any processing. A-TEC also collects electronic waste (computers, cathode ray tubes, keyboards, etc.) for recycling at off-site facilities. I did not inquire into the amount of electronic waste managed or where it is shipped to for disposition.

A-TEC is located in an area which appears to be primarily industrial and commercial. A-TEC operates in a part of a building with other business tenants. A-TEC has about 12,000 ft<sup>2</sup> of floor space in two equally sized adjoining building spaces. The north half of the space occupied by A-TEC is warehouse area. The warehouse primarily contains electronic equipment for recycling and an employee use area. I copied a facility diagram of the south half of the A-TEC occupied space, which houses office and processing area (attachment 5). Mr. Young said that they are currently buying the building and property on contract from the owner. Nine employees staff operations one shift per day, five days per week.

## **RCRA Status**

A-TEC is a small quantity handler of universal waste, a universal waste transporter and a universal waste destination facility. I inspected A-TEC for those applicable regulations under the RCRA.

## **FINDINGS AND OBSERVATIONS**

A previous RCRA CEI was conducted at A-TEC in April 1999.

Mr. Young said that they do not manage or receive any universal waste pesticides at A-TEC. I did not find any record of receipt of universal waste pesticide during my review of documents.

A-TEC is not conducting any recycling activity or managing any waste under the definition of solid waste final rule, which became effective in Iowa at the end of December 2008.

## **Wastes**

Most waste generated at A-TEC is from spent lamp processing. Mr. Young said that they process spent lamps generally within two days after receiving the spent lamps. Mr. Young said that they operate the spent lamp processing equipment about 225 days each year. In 2009, about 900,000 spent lamps were processed. The spent lamps processed are fluorescent lamps (mostly 4-foot and 8-foot and some specialty U-tube, circular and compact) and HID lamps. When universal wastes are received at A-TEC, the containers they arrive in are opened, and items inside the containers are counted and recorded. After counting and recording, spent lamps are placed in an area for processing. The spent lamp containers are not closed after counting. At the time of this CEI, about 200 containers of spent lamps had been counted and were awaiting processing. The containers were not closed (attachment 10, photos 7-9). This is a violation of 40 CFR 273.13(d)(1) (NOV # 1).

**Waste particulate (lamp phosphor)** is accumulated in three satellite accumulation drums near the lamp processing machine (attachment 8 page 5 and attachment 10, photos 4-6). The facility has determined that the waste particulate is a non-hazardous waste based upon testing. I obtained a copy of the toxicity characteristic leaching procedure test result for mercury content (attachment 6). Currently, about 25,000 pounds of waste particulate are generated each month. The waste particulate is shipped to Bethlehem Apparatus Co. in Hellerton, PA for metal recovery in a retort furnace.

**Spent filter waste** from the lamp processing equipment is generated from replacement of hepa filter elements and carbon filter media (attachment 8 page 5). The facility has determined that the spent filter waste is a non-hazardous waste based on materials and process knowledge and testing of the waste particulate. Mr. Young estimated that changing the hepa filter elements generates about 250 pounds of spent filter waste every four to six months. Mr. Young estimated that the carbon filter media replacement generates about 500 pounds of spent filter waste every 30 to 36 months. The spent filter waste is added to the waste particulate sent to Bethlehem Apparatus Co. for metal recovery.

**Crushed glass** is generated from lamp processing (attachment 8 page 5). The facility has determined that the waste particulate is a non-hazardous waste based on materials use and process knowledge and testing. I obtained a copy of the toxicity characteristic leaching procedure test result for mercury content (attachment 6). Currently, about 40,000 pounds of crushed glass are generated each month. Mr. Young said that the crushed glass is sold or given to construction contractors for use as fill material or as an admixture in concrete.

**Metal end caps** are generated from lamp processing and are managed as scrap metal (attachment 8 page 6). About 15,000 pounds of scrap end caps are generated each year. Mr. Young said that the metal scrap is sold to Alter Metals in Des Moines.

**Universal waste batteries** from various generators are bulked in accumulation containers (attachment 8 page 6 and attachment 10, photos 1-3). The universal waste batteries are shipped to Interco Trading Co. in Madison, IL for recycling, except for mercury containing batteries. Mercury containing batteries are shipped to Bethlehem Apparatus Co. for recycling. In 2009, A-TEC shipped off-site about 75,000 pounds of lead-acid batteries, about 9,700 pound of nickel-cadmium batteries, about 3,500 pounds of lithium type batteries and an undetermined amount of alkaline batteries. Universal waste battery accumulation was observed during this CEI and most universal waste batteries were accumulated in 55-gallon containers (attachment 10, photos 1-3). Two wooden crates used for accumulating sealed lead-acid batteries were not marked to identify their contents (attachment 10, photo 3). This is a violation of 40 CFR 271.14(a) (**NOV # 2**). Mr. Young had personnel mark the two crates during the CEI (attachment 10, photos 10-11).

**Universal waste mercury containing equipment** collected by or sent to A-TEC is accumulated in containers and shipped to Bethlehem Apparatus Co. for recycling (attachment 8 page 6). In 2009, about 1,400 pounds of mercury containing equipment was shipped to Bethlehem Apparatus Co., including universal waste batteries with mercury, for recycling.

**Spent personnel protective equipment (PPE)** worn during handling of hazardous materials includes gloves, masks, sleeves, some aprons and some respirator cartridges (attachment 8 page 7). The facility has determined that the spent PPE waste is a non-hazardous waste based on materials and process knowledge and testing of the waste particulate. Mr. Young estimated that the amount of spent PPE waste generated is about 200 pounds per year. The spent PPE is added to the universal waste mercury containing equipment sent to Bethlehem Apparatus Co. for recycling.

**Spent lighting fixture ballasts** are collected from customers (attachment 8 page 7). The ballasts are bulked in containers after arriving at A-TEC. The spent ballasts are shipped to Veolia Technical Solutions, LLC in Phoenix, AZ for recycling. I did not determine the amount of spent ballasts managed by A-TEC.

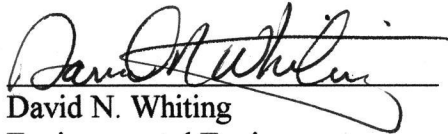
### **Recordkeeping**

I reviewed random bills of lading for incoming universal wastes and outbound shipping records. The bills of lading, shipping records and documentation that I reviewed were adequate. I copied some typical inbound bills of lading and outbound shipping documents for universal waste (attachment 7).

### **Summary**

At the exit interview I discussed the violations cited and the desirability of a facility representative to respond to the violation, in writing, within 14 calendar days (attachment 8 page 10). I suggested that the operators of A-TEC visit locations and companies that recycle or dispose of wastes shipped off-site. I suggested this as a best management practice and not out of any particular concern about the facilities chosen for recycling, treatment or disposal of wastes.





David N. Whiting  
Environmental Engineer

Date: 2/18/10

#### Attachments

1. Region 7 Multi-Media Screening Checklist (2 pages)
2. Notice of Violation (1 page)
3. Inspection Confidentiality Notice (1 page)
4. Receipt for Documents (1 page)
5. Facility diagram and aerial view (2 pages)
6. Test result (1 page)
7. Bills of lading and shipping records, typical (22 pages)
8. Inspection data gathering sheets (10 pages)
9. Photo log (1 page)
10. Photographs, 11 photos (6 pages)

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: A TEL Recycling, Inc.  
 Facility Ownership: \_\_\_\_\_  
 Street: 5745 NE 17th St.  
 City: Des Moines State: IA Zip: 50313  
 Phone: (515) 244-7357 Facility Contact: Larry Young  
 Number of Employees: 9 Work Hours/Shifts: 8-5 5d/w Facility Subject to OSHA regulations Yes ☐ No ☒

Inspector: Dev. J. Whiting  
 Primary Media: RCRA  
 Inspector Phone Ext.: (319) 557-2618  
 Date: 2/4/10  
 SIC/NAICS Code: 562111, 42393

Main facility activity, major process chemical(s) & description: bdg leased space ~12,000 ft<sup>2</sup>  
- 33,000 ft<sup>2</sup> entire bldg.

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☐ , distilling ☐ ,  
 water treatment ☐ , refrigeration ☐ , manufacturing ☐ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,  
 non-halogenated-based ☐ , combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other \_\_\_\_\_).  
*not gas for air burn.*

ENVIRONMENTAL JUSTICE ( Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐  
 If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ **Forward to EJ**

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ **Forward to EPCRA**  
 2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☐ (stop) Yes ☐ **Forward to EPCRA**  
*not sure, maybe its*  
 3. Has the facility: **If any box in question 3 is marked - Forward to EPCRA**  
 a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☐ , or ≥10,000 lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐  
 b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐  
 c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐  
 d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐  
 4. Does the facility have any oil filled electrical equipment? No ☒ (stop) Yes ☐ **Forward to TSCA and ask** Has facility tested oil filled equipment to determine PCB content? No ☐ Yes ☐ number containing PCBs greater than 50 ppm \_\_\_\_\_ and percent of all equipment tested \_\_\_\_\_. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - **Get Photo**

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐  
 If yes, are all wastewater discharges permitted? Yes ☐ No ☐ **Forward to CWA**  
 2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐  
 If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ **Forward to CWA** *domestic waste only*  
 If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ **Forward to CWA**  
 3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☐  
*lease bldg. space*  
 If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ **Forward to CWA**  
 4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: \_\_\_\_\_  
 (Get Photo) **Forward to CWA**  
 5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐  
 If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?  
 No ☐ (stop) Yes ☐ - Identify location and timeframe \_\_\_\_\_ (Get Photo) **FWD to Wetlands**



**SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)**

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ Forward to UIC  
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ Forward to PWS  
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

**CLEAN AIR ACT (CAA) and CFCs**

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ Forward to CAA  
Source lamp processor not operating on 2/4/10 (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☐ (stop) Yes ☐  
If yes, is equipment permitted? Yes ☐ No ☐ Forward to CAA Describe: carbon filters added to processor vent line, but not a new emission point
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ Forward to CFC  
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: \_\_\_\_\_
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ Forward to EPCRA/RMP
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ Forward to CFC

**RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)**

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☐  
If yes, does facility have an EPA Hazardous Waste Identification Number? None Yes ☐ (stop) No ☐ Forward to RCRA
2. Is hazardous waste treated ☐, stored >90-days ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐?  
No ☐ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ Forward to RCRA
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐

**Material Claimed To Be Non-Hazardous**

dust & filters  
glass  
hangers  
cardboard

**How does the facility know these wastes are non-hazardous?**

Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA  
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA  
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA  
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA  
Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ Forward to RCRA  
Describe: \_\_\_\_\_ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ Forward to RCRA  
Describe: \_\_\_\_\_ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ Forward to RCRA & EPCRA Describe: \_\_\_\_\_ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ Forward to UST
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ Forward to UST

**SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)**

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?  
No ☐ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ Forward to SPCC  
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ Forward to SPCC  
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) Forward to SPCC

**ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)**

1. Does your facility have an EMS? No ☒ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☐ Yes ☐

**\* PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS**



Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: A-TEC Recycling Inc.  
Address: 5745 NE 17th St  
Des Moines, IA 50313  
EPA ID Number: IA0000109827 Date: 2/4/2010

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation

Description of Violation

<u>40 CFR 273.13(d)(1)</u>	<u>Universal waste bump containers are not closed.</u>
<u>40 CFR 273.14(a)</u>	<u>Universal waste battery containers not marked</u> <u>(two crates of lead-acid batteries).</u>

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

David M. Whiting 922 Walnut St.  
Lebanon City, PA 17040

ATTN. \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at

(319) 887-2618, or Elizabeth Koesterer (Compliance Officer) at  
(913) 551-7673.

This Notice prepared by David M. Whiting Date: 02/1/10

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Signature:

Title:

Larry Young Date: 2/4/2010  
Larry Young  
President



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

Facility Name <i>A-TEC Recycling, Inc.</i>	
Facility Address <i>5745 NE 17th St. Des Moines, IA 50313</i>	
Inspector (print) <i>David M. Whiting</i>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date <i>2/4/10</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Larry Young</i>	Signature/Date <i>2/4/10 Larry Young</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <i>A-TEC Recycling, Inc.</i>
Facility Address <i>5745 N 12 17th St. Des Moines, IA 50313</i>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$  Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- 1) Facility diagram (1 page)
- 2) Shipping documents to ~~interco~~ <sup>Bethlehem</sup> (8 pages) (Hatteries) MW
- 3) Shipping documents to interco (10 pages) (Dust filters) MW
- 4) Test results (1 page)
- 5) Incoming bill of lading (3 pages)

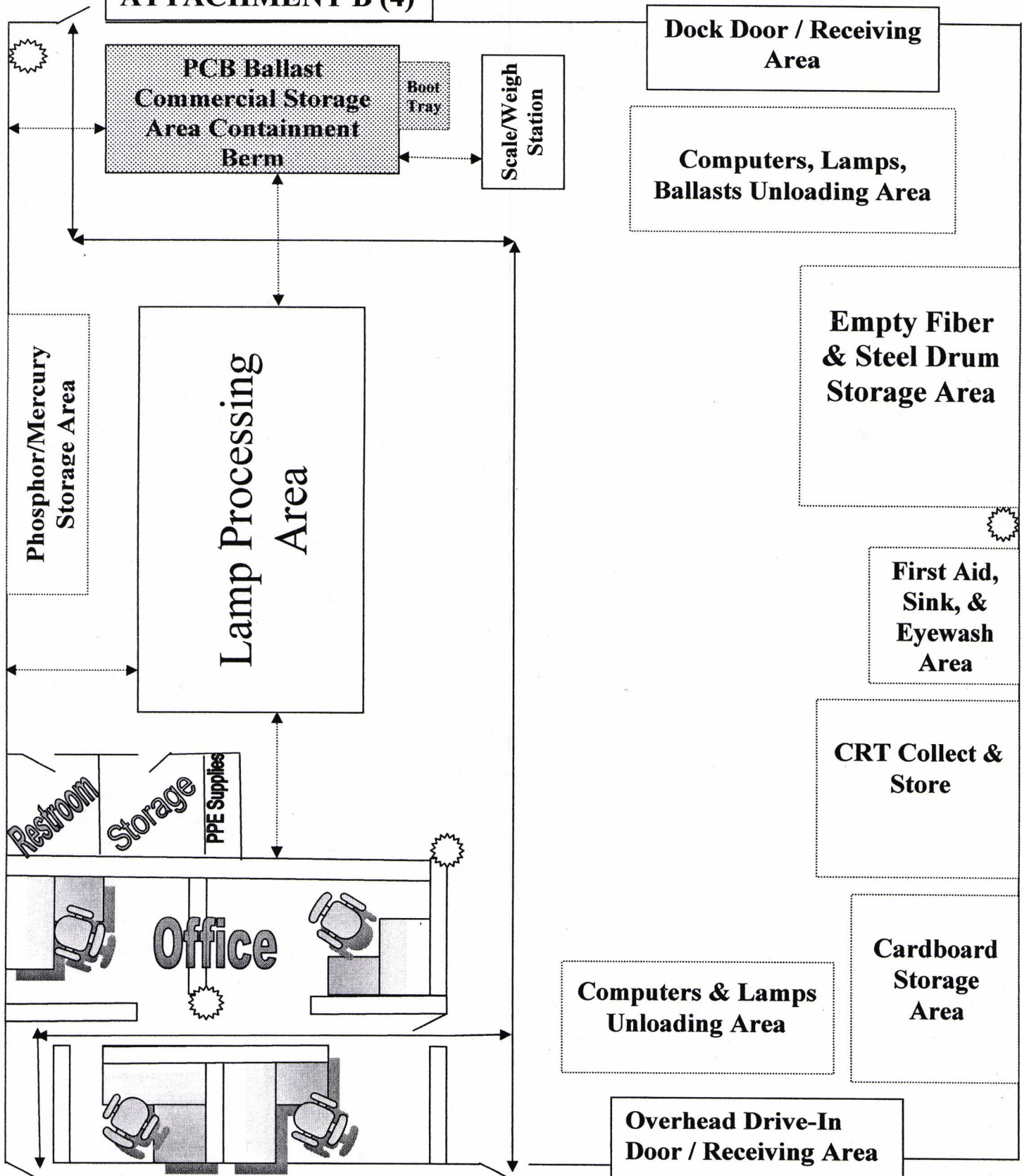
Facility Representative (print) <i>Larry Young</i>	Signature/Date <i>Larry Young</i> 2/4/10
Inspector (print) <i>David M. Whiting</i>	Signature/Date <i>David M. Whiting</i> 2/4/10
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev:1/20/93)



**Commercial Storage Application**  
 Submitted to the U S Environmental Protection Agency, Region 07 for:  
**A-TEC Recycling Inc.**

**ATTACHMENT B (4)**



page

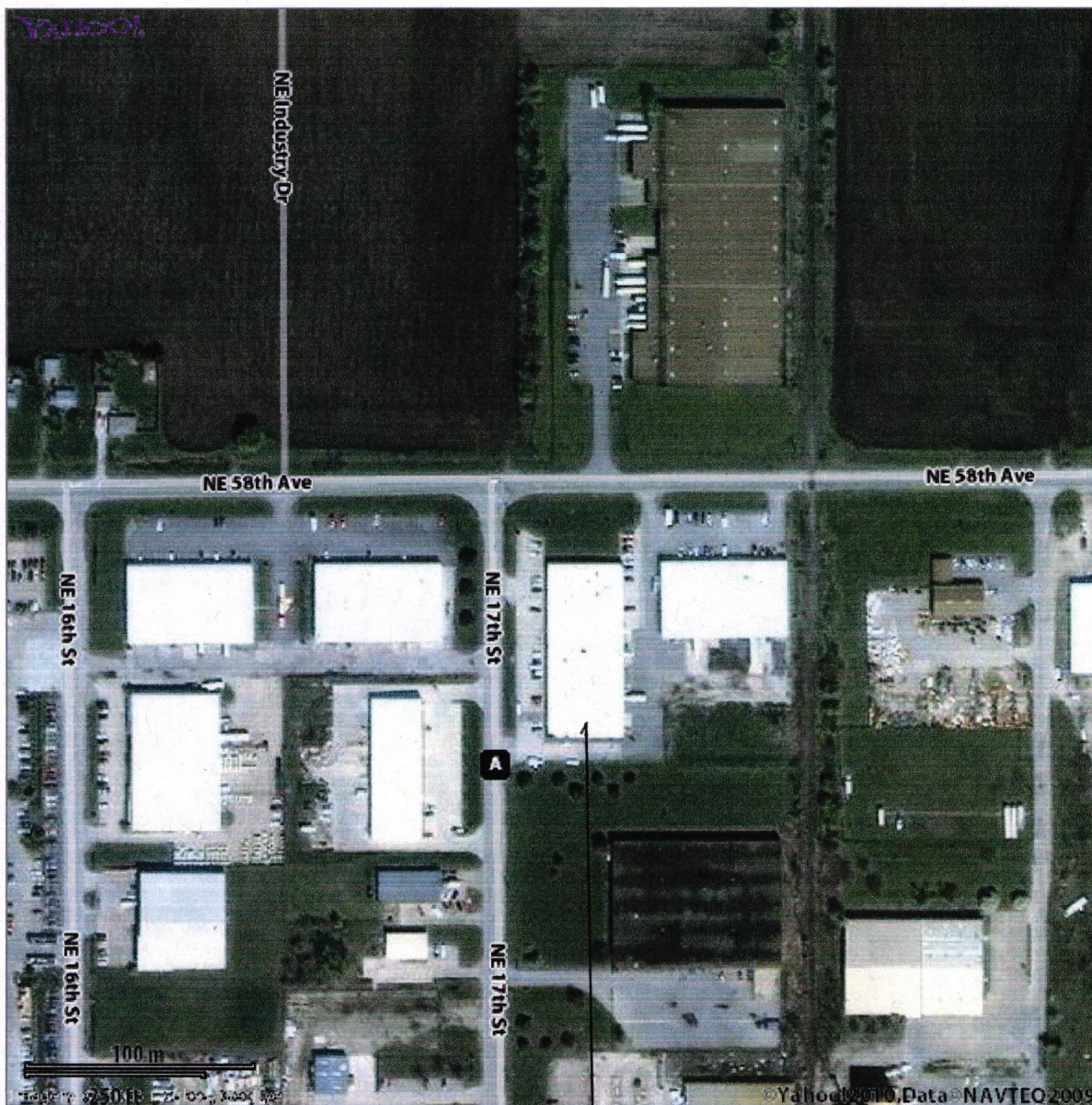
**KEY** → = Pathways to Exits  
 ☆ = Fire extinguisher  
 [Hatched Box] = Porous Areas  
 [Dotted Box] = Non-Porous Areas

21



## Map of A-Tec Recycling Incorporated (515) 263-3707

YAHOO!®



When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

A-Tec Recycling Inc.

ATTACHMENT 5 Page 2 of 2



A-TEC RECYCLING, INC.  
5745 NE 17th Street P.O. Box 7391  
Des Moines, IA 50309  
Larry Young

Work Order: CSF1256  
Project: TCLP Mercury Testing  
Project Number: (none)

Received: 06/24/09  
Reported: 07/07/09 14:48

## ANALYTICAL REPORT

Analyte	Sample Result	Data Qualifiers	Units	Quant Limit	Dilution Factor	Date Analyzed	Analyst	Reg. Limit	Method
Sample ID: CSF1256-01 (Field Glass - Misc. Solid)					Sampled: 06/24/09 09:20		Recvd: 06/24/09 19:05		
TCLP Metals									
Mercury	0.00917	T6	mg/L	0.00200	1	07/02/09 11:20	lbb	0.2	SW 7470A
Sample ID: CSF1256-02 (Powder - Misc. Solid)					Sampled: 06/24/09 09:00		Recvd: 06/24/09 19:05		
TCLP Metals									
Mercury	0.0420	T6	mg/L	0.00200	1	07/02/09 11:22	lbb	0.2	SW 7470A
Sample ID: CSF1256-03 (Bunker Glass - Misc. Solid)					Sampled: 06/24/09 09:15		Recvd: 06/24/09 19:05		
TCLP Metals									
Mercury	0.0130	T6	mg/L	0.00200	1	07/02/09 11:24	lbb	0.2	SW 7470A

**BILL OF LADING**

100204-29673

**CUSTOMER****GENERATOR**

Musco Lighting 100 1st Ave West Osaka, Ia 52577		Musco Lighting 100 1st Ave West Osaka, Ia 52577	
SHIPPING OR P.O. #	DATE: 2/4/10	PICKUP	<input checked="" type="checkbox"/> DELIVERED

QUANTITY	LAMP TYPE	DRUM
	Fluorescent $\leq$ 4' and Compacts	DROP 4'(190) 4'(80) 8' Steel
	Fluorescent > 4'	PICKUP 4'(190) 4'(80) 8' Steel
	Shielded Fluorescent, all lengths	LOOSE 4'(190) 4'(80) 8' Steel
	U Shape and Circular	NOTES:
200 EST	High Intensity Discharge 273 Act	
Est: Lbs	Crushed Fluorescent Lamps(Act Lbs.)	
	Other	
<b>◀ TOTAL UNITS RECEIVED</b>		RECEIVED: A P DATE:
		PROCESSED: A P DATE:

QUANTITY	BALLASTS	DRUM
PCB	Non PCB	
	Ballasts (Fluorescent 4' & under)	DRUM #:
	Ballasts (Fluorescent over 4')	DRUM #:
	Capacitors	DRUM #:
	Other Items:	
<b>◀ TOTAL UNITS RECEIVED</b>		

RECEIVED, subject to the classification and regulations in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (exact contents of packages unknown).  
RECEIVED, subject to the terms and conditions of A-TEC Recycling, Inc. Service Agreement or Contract for Services. All lamps to be processed for recycling within 24 hours after receipt at the destination A-TEC Recycling Facility as indicated in the Service Agreement or Contract for Services.

This is to certify that the above described lamps/ballasts were picked up or delivered as noted for recycling. The packages contain the materials as described and do not contain any non-described material.

Customer or Generator Authorized

By: Pat Cuzen

Date: 2/4/10

EPA #:

1A0000109827

A-TEC Recycling, Inc. Accepted By: Daniel Smith

ATTACHMENT 7 Page 1 of 22









# BILL OF LADING

080318-25881

## CUSTOMER

## GENERATOR

DES MOINES PUBLIC SCHOOLS  
901 WALNUT  
DES MOINES, IA 50309

DES MOINES PUBLIC SCHOOLS  
1915 PROSPECT ROAD  
DES MOINES, IA 50310

SHIPPING  
OR P.O. # 282683

DATE: 3/18/08



PICKUP

DELIVERED

QUANTITY	LAMP TYPE	DRUM			
1000 <sup>EST</sup>	Fluorescent ≤ 4' and Compacts 1666 LBS	DROP	4'(190) 8	4'(80) 8'	Steel
	Fluorescent > 4'	PICKUP	4'(190) 8	4'(80) 8'	Steel
	All Shielded Fluorescent	RECEIVED	7:00	(A/P) DATE	3-19-8
150 <sup>EST</sup>	U Shape and Circular 134 LBS	PROCESSED	8:00	(A/P) DATE	3-19-8
	High Intensity Discharge	COMPUTERS			
Est: _____ Lbs	Crushed Lamps (Act 13.7K LBS)	DRUM	TYPE	EST(Lbs)	ACT(Lbs)
	Other				
TOTAL UNITS	NOTES Broken lamps In Bottom of 4' Drum 1-4' Drum damaged unable to reuse				
QUANTITY	BALLASTS	BATTERIES			
PCB	Non PCB	DRUM	TYPE	EST(Lbs)	ACT(Lbs)
	Ballasts (Fluorescent 4' & under)				
	Ballasts (Fluorescent over 4')				
	HID Ballasts				
	Capacitors				
	Other Items				
TOTAL UNITS	NOTES	TOTAL UNITS RECEIVED			
		NOTES			

RECEIVED, subject to the classification and regulations in effect on the date of issue of this Bill of Lading, the property described above in apparent good order, except as noted (exact contents of packages unknown).

RECEIVED, subject to the terms and conditions of A-TEC Recycling, Inc. Service Agreement or Contract for Services. All lamps to be processed for recycling within 24 hours after receipt at the destination A-TEC Recycling Facility as indicated in the Service Agreement or Contract for Services.

This is to certify that the above described lamps/ballasts were picked up or delivered as noted for recycling. The packages contain the materials as described and do not contain any non-described material.

Customer or Generator Authorized

By: *Jim Smith*

Date: 18 MAR 08

EPA# 1A0000109827

A-TEC Recycling, Inc. Accepted By: *[Signature]*

ATTACHMENT 7 Page 3 of 22



MANIFEST NUMBER: 8042

SHIP DATE: 1-24-9

SHIPPING LOG						
VENDOR DRUM NUMBER (If applicable)	A-TEC DRUM NUMBER	LBS	KILO	LOADED	INVOICED	ENTERED
Phosphorus ✓	6491	523	237	✓		
Powder ✓ 2	6527	719	326.5	✓		
✓ 3	6528	355	161	✓		
✓ 4	6546	760	344	✓		
✓ 5	6552	701	318	✓		
✓ 6	6555	718	325	✓		
✓ 7	6556	538	232	✓		
✓ 8	6559	682	309	✓		
✓ 9	6561?	716	324	✓		
✓ 10	6569	614	278	✓		
✓ 11	6573	689	312	✓		
✓ 12	6578	322	146	✓		
✓ 13	6579	667	302	✓		
✓ 14	6586	732	332	✓		
✓ 15	6592	746	338	✓		
✓ 16	6595	519	235	✓		
✓ 17	6597	713	323	✓		
✓ 18	6603	626	284	✓		
✓ 19	6608	709	321	✓		
✓ 20	6615	757	343	✓		
✓ 21	6624	691	313	✓		

ATTACHMENT 7 Page 4 of 22

OUTGOING TO: Bethlehem

MANIFEST NUMBER:

8042

SHIP DATE:

1-24-9

## SHIPPING LOG

VENDOR DRUM NUMBER (If applicable)	A-TEC DRUM NUMBER	LBS	KILO	LOADED	INVOICED	ENTERED
Phosphorus <sup>22</sup> ✓	6625	731	331	✓		
Powder <sup>23</sup> ✓	6632					
	<del>6633</del>	632	285	✓		
<sup>24</sup> ✓	6646	749	339	✓		
<sup>25</sup> ✓	6647	741	336	✓		
<sup>26</sup> ✓	6650	565	256	✓		
<sup>27</sup> ✓	6652	676	306	✓		
<sup>28</sup> ✓	6659	677	307	✓		
<sup>29</sup> ✓	6660	353	160	✓		
<sup>30</sup> ✓	6662	710	322	✓		
<sup>31</sup> ✓	6667	717	325	✓		
<sup>32</sup> ✓	6668	651	295	✓		
<sup>33</sup> ✓	6670	658	298	✓		
<sup>34</sup> ✓	6674	<del>286</del> 630	286	✓		
<sup>35</sup> ✓	6678	695	315	✓		
<sup>36</sup> ✓	6680	651	295	✓		
<sup>37</sup> ✓	6683	712	323	✓		
<sup>38</sup> ✓	6685	706	320	✓		
<sup>39</sup> ✓	6689	700	317	✓		
<sup>40</sup> ✓	6693	596	270	✓		
<sup>41</sup> ✓	6694	455	342	✓		
<sup>42</sup> ✓	6697	719	326	✓		

ATTACHMENT 7 Page 5 of 22OUTGOING TO: Bethlehem



8047

124-9

SHIPPING LOG						
VENDOR DRUM NUMBER (If applicable)	A-TEC DRUM NUMBER	LBS	KILO	LOADED	INVOICED	ENTERED
Phosphura ✓ <sub>43</sub>	6699	711	322	✓		
Powder ✓ <sub>44</sub>	6702	646	293	✓		
✓ <sub>45</sub>	6706	726	327	✓		
✓ <sub>46</sub>	6735?	729	330	✓		
✓ <sub>47</sub>	6745	718	325	✓		
Misc ✓ <sub>1</sub>	6494	223	101.3	✓		
Merc ✓ <sub>2</sub>	6648	223	101.3	✓		
✓ <sub>3</sub>	6695	322	146.2	✓		
		768 lbs				

29306 Powder

ATTACHMENT 7 Page 4 of 22

OUTGOING TO: Bethlehem





# BILL OF LADING

8042

DEST. NATU  
CUSTOMER

GENERATOR

BETHLEHEM APPARATUS  
890 FRONT ST.  
HELLERTON, PA 18055

A-TEC RECYCLING  
5745 NE 17th ST  
DES MOINES, IA 50313

SHIPPING  
OR P.O. #

DATE: 01/29/09

PICKUP

DELIVERED

## QUANTITY

## LAMP TYPE

## DRUM

Fluorescent  $\leq 4'$  and Compacts  
Fluorescent  $> 4'$   
Shielded Fluorescent, all lengths  
U Shape and Circular  
High Intensity Discharge  
Crushed Fluorescent Lamps(Act \_\_\_\_\_ Lbs.)  
Other \_\_\_\_\_

Est: \_\_\_\_\_ Lbs

◀ TOTAL UNITS RECEIVED

DROP

4'(190) \_\_\_\_\_ 4'(80) \_\_\_\_\_ 8' \_\_\_\_\_ Steel \_\_\_\_\_

PICKUP

4'(190) \_\_\_\_\_ 4'(80) \_\_\_\_\_ 8' \_\_\_\_\_ Steel \_\_\_\_\_

LOOSE

4'(190) \_\_\_\_\_ 4'(80) \_\_\_\_\_ 8' \_\_\_\_\_ Steel \_\_\_\_\_

NOTES:

SEAL #  
777756

RECEIVED:

A  
P

DATE:

PROCESSED:

A  
P

DATE:

## QUANTITY

## BALLASTS

## DRUM

PCB Non PCB

Ballasts (Fluorescent 4' & under)  
Ballasts (Fluorescent over 4')  
Capacitors  
Other Items: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

◀ TOTAL UNITS RECEIVED

DRUM #:

TRAILER #

DRUM #:

TA954193

DRUM #:

50-MERCURY DEVICE +  
PHOSPHOR POWDER DRUMS  
UN#2809

TOTAL 31,512 lbs

RECEIVED, subject to the classification and regulations in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (exact contents of packages unknown).  
RECEIVED, subject to the terms and conditions of A-TEC Recycling, Inc. Service Agreement or Contract for Services. All lamps to be processed for recycling within 24 hours after receipt at the destination A-TEC Recycling Facility as indicated in the Service Agreement or Contract for Services.

This is to certify that the above described lamps/ballasts were picked up or delivered as noted for recycling. The packages contain the materials as described and do not contain any non-described material.

Customer or Generator Authorized

By: \_\_\_\_\_

Date: \_\_\_\_\_

EPA #: **1A0000109827**

A-TEC Recycling, Inc. Accepted By: \_\_\_\_\_



MANIFEST NUMBER:

9021

SHIP DATE:

12-14-9

Powder Drums On Site 10/26/09

## SHIPPING LOG

VENDOR DRUM NUMBER (If applicable)	A-TEC DRUM NUMBER	LBS	KILO	LOADED	INVOICED	ENTERED
West Drum 1	6506					
F 2	6738	375	170	✓		
3	6746	560	254	✓		
4	6750	643	291	✓		
5	6757	703	319	✓		
F 6	6770	701	318	✓		
F 7	6780	508	230	✓		
8	6792	577	261.7	✓		
F 9	6793	609	276	✓		
F 10	6795	600	272	✓		
11	6799	633	287	✓		
F 12	6808	626	284	✓		
F 13	6810	600	272	✓		
14	6812	380	172	✓		
15	6816	448	248	✓		
16	6817	509	231	✓		
F 17	6818	590	267	✓		
F 18	6830	613	278	✓		
19	6835	621	283	✓		
20	6842	558	266	✓		
21	6852	627	284	✓		
F 22	6857	403	182	✓		
23	6862	551	250	✓		
24	6867	633	287	✓		
25	6875	621	281	✓		
26	6888	596	270	✓		
F 27	6894	391	177.0	✓		
28	6903	621	282.0	✓		
F 29	6912	623	282.0	✓		
F 30	6919	623	282.5	✓		
31	6923	530	240.0	✓		
F 32	6929	606	274.8	✓		
33	6943	558	253.1	✓		
F 34	6951	628	285	✓		
F 35	6959	607	275	✓		
F 36	6986	547				
37	6948	438	198	✓		
38						
39						
40						
41						
42						
43						

ATTACHMENT 7 Page 8 of 22

OUTGOING TO:

Bethlehem







# BILL OF LADING

9021

DESTINATION  
CUSTOMER

GENERATOR

BETHLEHEM APPARATUS CO. 890 FRONT ST. P.O. BOX 7 HEILERTOWN, PA 18055		A-TEC RECYCLING 5745 NE 17th ST DES MOINES, IA	
SHIPPING OR P.O. #	DATE:	PICKUP	<input checked="" type="checkbox"/> DELIVERED

QUANTITY	LAMP TYPE	DRUM	
	Fluorescent $\leq$ 4' and Compacts	DROP	4'(190) 4'(80) 8' Steel
	Fluorescent > 4'	PICKUP	4'(190) 4'(80) 8' Steel
	Shielded Fluorescent, all lengths	LOOSE	4'(190) 4'(80) 8' Steel
	U Shape and Circular	NOTES:	
	High Intensity Discharge		
Est: _____ Lbs	Crushed Fluorescent Lamps(Act _____ Lbs.)		
	Other _____		
<b>◀ TOTAL UNITS RECEIVED</b>		RECEIVED:	A P DATE:
		PROCESSED:	A P DATE:

QUANTITY		BALLASTS	DRUM
PCB	Non PCB		
		Ballasts (Fluorescent 4' & under)	DRUM #: <u>2-Mercury 1724 Bms - 22716</u>
		Ballasts (Fluorescent over 4')	DRUM #: _____
		Capacitors	DRUM #: _____
		Other Items: _____	2-Mercury 1724 Bms - 22716
		_____	5-Mercury 1724 Bms - 125616
		_____	36-Mercury Powder Bms - 20,69016
<b>◀ TOTAL UNITS RECEIVED</b>			<b>TOTAL - 22,173 lbs</b>

RECEIVED, subject to the classification and regulations in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (exact contents of packages unknown).

RECEIVED, subject to the terms and conditions of A-TEC Recycling, Inc. Service Agreement or Contract for Services. All lamps to be processed for recycling within 24 hours after receipt at the destination A-TEC Recycling Facility as indicated in the Service Agreement or Contract for Services.

I certify that the above described ballasts were picked up or delivered as cycling. The packages contain the described and do not contain any material.

Customer or Generator Authorized



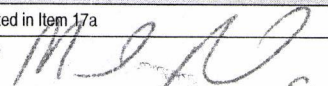
By: \_\_\_\_\_

Date: 12-14-09

EPA #: 1A0000109827

A-TEC Recycling, Inc. Accepted By: \_\_\_\_\_



<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CE500</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>515-263-7707</b>	4. Waste Tracking Number <b>9021</b>	
5. Generator's Name and Mailing Address <b>A-TEC Recycling Inc</b> <b>5745 NE 17A ST</b> <b>PO Box 7391</b> <b>DELS MONELLIA</b>			Generator's Site Address (if different than mailing address)			
Generator's Phone: <b>(515) 263-7707</b>						
6. Transporter 1 Company Name <b>A-TEC Recycling</b>			U.S. EPA ID Number <b>TAC000109827</b>			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address <b>Bethlehem Apparatus Co.</b> <b>890 FRONT ST.</b> <b>PO Box Y</b> <b>HELCERTOWN, PA 18055</b>			U.S. EPA ID Number			
Facility's Phone: <b>(610) 882-2611</b>						
9. Waste Shipping Name and Description			10. Containers		11. Total Quantity	12. Unit Wt./Vol.
			No.	Type		
1. <b>MERCURY POWDER</b>			<b>036</b>	<b>DM</b>	<b>20690</b>	<b>P</b>
2. <b>MERCURY FILTERS</b>			<b>002</b>	<b>DM</b>	<b>00227</b>	<b>P</b>
3. <b>MISCELLANEOUS MERCURY</b>			<b>005</b>	<b>DM</b>	<b>01256</b>	<b>P</b>
4.						
13. Special Handling Instructions and Additional Information						
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.						
Generator's/Officer's Printed/Typed Name <b>BIFF MOORE</b>			Signature 		Month <b>12</b>	Day <b>14</b>
					Year <b>09</b>	
INT'L	15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
	16. Transporter Acknowledgment of Receipt of Materials					
TRANSPORTER	Transporter 1 Printed/Typed Name <b>Daniel Leach</b>			Signature 		Month <b>12</b>
	Transporter 2 Printed/Typed Name			Signature		Day <b>14</b>
					Year <b>09</b>	
DESIGNATED FACILITY	17. Discrepancy					
	17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number:					
	17b. Alternate Facility (or Generator)			U.S. EPA ID Number		
Facility's Phone:						
17c. Signature of Alternate Facility (or Generator)						
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a						
Printed/Typed Name <b>MICHAEL KOELA</b>			Signature 		Month <b>12</b>	Day <b>10</b>
					Year <b>09</b>	





FLD # 11163  
OK  
Sum

# BILL OF LADING

9019

## CUSTOMER

## GENERATOR

INTERCO TRADING 10 FOX TND PARK MADEIRA, IL 62060		A-TEC RECYCLING 5745 NE 17th ST DES MOINES, IA	
SHIPPING OR P.O. #	DATE: 12-7-09	PICKUP	DELIVERED

QUANTITY	LAMP TYPE	DRUM
	Fluorescent ≤ 4' and Compacts	DROP 4'(190) 4'(80) 8' Steel
	Fluorescent > 4'	PICKUP 4'(190) 4'(80) 8' Steel
	Shielded Fluorescent, all lengths	LOOSE 4'(190) 4'(80) 8' Steel
	U Shape and Circular	NOTES: 181 MONITORS - 5430 lbs ✓ 3- ALUMINUM - 1847 lbs ✓ 7- L.A. - 13,000 lbs ✓ 1- NON-PCB BALLAST - 5,000 lbs ✓
	High Intensity Discharge	
Est: _____ Lbs	Crushed Fluorescent Lamps(Act _____ Lbs.)	
	Other _____	
◀ TOTAL UNITS RECEIVED		RECEIVED: A P DATE: _____ PROCESSED: A P DATE: _____

QUANTITY		BALLASTS	DRUM
PCB	Non PCB		
		Ballasts (Fluorescent 4' & under)	DRUM #: TOTAL
		Ballasts (Fluorescent over 4')	DRUM #: 39,361 lbs
		Capacitors	DRUM #:
		Other Items: _____	1- NON-PCB CAPS - 1962 lbs ✓
		_____	6- MISC ELECTRONIC - 5,519 lbs ✓
		_____	3- TRANS FORMER - 4521 lbs ✓
		◀ TOTAL UNITS RECEIVED	4- NiCAD - 1938 lbs ✓

RECEIVED, subject to the classification and regulations in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (exact contents of packages unknown).  
RECEIVED, subject to the terms and conditions of A-TEC Recycling, Inc. Service Agreement or Contract for Services. All lamps to be processed for recycling within 24 hours after receipt at the destination A-TEC Recycling Facility as indicated in the Service Agreement or Contract for Services.

This is to certify that the above described lamps/ballasts were picked up or delivered as noted for recycling. The packages contain the materials as described and do not contain any non-described material.

Customer or Generator Authorized

By: \_\_\_\_\_

Date: 12-7-09

EPA #:

IA0000109827

A-TEC Recycling, Inc. Accepted By: \_\_\_\_\_

ATTACHMENT 7 Page 12 of 22



Networking gear	\$0.25		e.g. routers, hubs, switches, modems
CRT monitors 14" through 20"		(\$1.50)	Palletized and wrapped with cardboard between layers
Terminals and screen-burned CRT monitors		(\$8.00)	Palletized and wrapped with cardboard between layers
All-in-one units		(\$1.50)	Palletized and wrapped with cardboard between layers
LCD flat-panel monitors	\$0.25		Screen intact with no visible damage aside from minor scratches, with or without stand, bubble-wrapped and stacked
CRT televisions	(\$0.25)		Intact CRTs (no broken glass), loose in boxes or palletized
Microwaves	(\$0.10)		Glass intact, loose in boxes or palletized
Toner and inkjet cartridges	(\$0.10)		
Capacitors	(\$0.05)		
Mixed computer wire	\$0.75		Power cords, printer and monitor cables, etc.; minimal ribbon wire, no AC adapters
Ribbon wire	\$0.25		
Copper degaussing wire	\$1.75		
Aluminum degaussing wire	\$0.45		
Copper yokes	\$0.60		
AC adapters	\$0.16		Adapters/chargers with or without wires attached
UPS power supplies	\$0.15		Backup power supplies with or without batteries
Lead-acid batteries	\$0.22		Palletized and wrapped with cardboard between layers
Steel-cased lead-acid batteries	\$0.18		Palletized and wrapped with cardboard between layers
Sealed lead-acid batteries	\$0.22		Loose in boxes or barrels or palletized and wrapped
Absolyte batteries	\$0.10		Palletized and wrapped with cardboard between layers
Steel-cased Absolyte batteries	\$0.06		Palletized and wrapped with cardboard between layers
Non-PCB ballasts	\$0.14		
Aluminum HID	\$0.30		
Steel HID	\$0.20		
Aluminum end caps	(\$0.05)		
NiCad batteries	\$0.30		Contacts on battery cells must be covered per DOT as of 1/1/10
NiMH batteries	\$0.55		Contacts on battery cells must be covered per DOT as of 1/1/10
Li-ion batteries	\$1.25		Contacts on battery cells must be covered per DOT as of 1/1/10
Wet NiCad batteries	\$0.05		Palletized and wrapped with cardboard between layers
Alkaline batteries	(\$0.25)		
Lithium primary batteries	(\$3.00)		Contacts on battery cells must be covered per DOT as of 1/1/10
Cell phones	\$2.00		All cell phone types, no batteries can be present
Copper transformers	\$0.38		Solitary copper-coil transformers (i.e. not in cases)



# interco

## TRADING COMPANY

### A METALTRONICS RECYCLER

Date: 12/3/2009  
Comex (cu): \$3.24  
LME al: \$0.975

- All prices listed are FOB your facility in a 53-foot van trailer (at least 30,000lb).
- A load whose net weight is less than 30,000lb will be subject to pricing re-evaluation and/or a freight surcharge.
- Prices listed in parentheses represent charges to you.
- Items with different prices that are mixed together will be priced altogether at the lowest applicable price.
- If you have additional items for sale, then please ask for additional pricing, as we are buyers of most scrap items.

Item	Price/lb	Price/unit	Item Description
PC circuit boards	\$2.75		Motherboards, sound cards, video cards
Monitor circuit boards	\$0.06		Circuit boards from CRT monitors and televisions
Mixed memory boards	\$6.50		Mixed gold and silver memory boards from CPUS/laptops
PCs, complete/incomplete	\$0.26		CPUs with some components present, including boards
Servers, complete/incomplete	\$0.20		Servers with some components present, al and steel racks
Laptops	\$0.40		Intact unit w/ some or all components
Hard drives	\$0.60		Unshredded w/ circuit boards present
Destroyed hard drives	\$0.45		Crushed or hole-punched hard drives w/ circuit boards present
Shredded hard drives	\$0.15		Shredded w/ circuit boards present
Power supplies	\$0.26		CPU and/or laptop power supplies
CD-ROM/floppy drives	\$0.10		Mixed drives
Internal computer fans	\$0.08		Plastic CPU fans with motors
Mixed computer plastic	(\$0.04)		All types/colors of plastic, loose in boxes or baled
Keyboards/mice	(\$0.04)		Loose in boxes or baled
Printers/fax machines/copiers	(\$0.04)		Loose in boxes or stacked and wrapped on skids
Miscellaneous e-scrap	(\$0.04)		e.g. radios, stereo equipment, VCRs, DVD players, vacuums
Steel	(\$0.02)		Scrap steel in boxes
Telephones	\$0.08		Desktop telephones

## CERTIFICATE OF RECYCLING

This certificate is hereby presented as verification that Interco Trading Company has received and recycled the following list of materials by converting them into products of commerce within the United States of America in compliance with all applicable federal, state, and local regulations:

[illegible]

All related information, including pertinent dates and contract numbers, is listed below:

Vendor name: A-TEC Recycling

Date shipped: December 7, 2009

Date received: December 8, 2009

Our invoice/PO #: 1222

Your invoice #: N/A

Approved by: Dave Godar

Date: December 8, 2009



90/9

12-7-9

SHIPPING LOG						
VENDOR DRUM NUMBER (If applicable)	A-TEC DRUM NUMBER	LBS	KILO	LOADED	INVOICED	ENTERED
Lead Acid	6961	11,000	4988.6	✓		
NICAD	6954	447	216.6	✓		
	6967	496	221.6	✓		
	6946	464	210.6	✓		
	6933	531	241.2	✓		

OUTGOING TO: Interco

## A-TEC Recycling Inc. BATTERY Drum Report For Manifest 9019

Drum #	Vendor	Vendor Drum Number	Shipped	Ship Date	Measured Weight	Manifest	
6933	INTERCO		<input checked="" type="checkbox"/>	12/7/2009	241.2	09019	
Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date	Generator
Batteries - Nickel Cadmium (N	136	0	90.7	200.0	29026	9/24/2009	JOHN DEERE DUBUQUE WORKS 18600 S. JOHN DEERE RD DUBUQUE, IA 52004
Batteries - Nickel Cadmium (N	18	0	8.3	18.3	29031	9/24/2009	SAUER-DANFOSS 2800 EAST 13TH STREET AMES, IA 50010
Batteries - Nickel Cadmium (N	184	0	109.3	241.0	29010	9/21/2009	JOHN DEERE TRACTOR ASSEMB 3500 E DONALD WATERLOO, IA 50704
		338	208.3	459.3			

\*\*\* Measured weight &lt;&gt; 23 kilos from actual weight - OFF BY - 32.9

6946	INTERCO				<input checked="" type="checkbox"/>	12/7/2009	210.6	09019
Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date	Generator	
Batteries - Nickel Cadmium (N	13	0	4.5	9.9	29193	10/23/2009	FORT MADISON COMMUNITY HO HIGHWAY 61 WEST FORT MADISON, IA 52627	
Batteries - Nickel Cadmium (N	6	0	1.5	3.3	29039	9/28/2009	HESKA 2538 SE 43RD STREET DES MOINES, IA 50327	
Batteries - Nickel Cadmium (N	29	0	33.4	73.6	29067	10/2/2009	KINGSTON ENVIRONMENTAL 15411 HANGAR RD KANSAS CITY, MO 64147	
Batteries - Nickel Cadmium (N	12	0	7.3	16.1	29128	10/14/2009	ADM 1251 BEAVER CHANNEL PKWY CLINTON, IA 52732	
Batteries - Nickel Cadmium (N	19	0	8.1	17.9	29126	10/13/2009	MUSCO LIGHTING 2107 STEWART RD MUSCATINE, IA 52761	
Batteries - Nickel Cadmium (N	16	0	13.4	29.5	29093	10/6/2009	WAVERLY LIGHT & POWER 1002 ADAMS PKWY WAVERLY, IA 50677	
Batteries - Nickel Cadmium (N	34	0	26.4	58.2	29130	10/14/2009	JOHN DEERE ENGINE WORKS 3801 WEST RIDGEWAY WATERLOO, IA 50704	
Batteries - Nickel Cadmium (N	23	0	16.0	35.3	29088	10/5/2009	GAZETTE COMMUNICATIONS 500 3RD AVENUE S E CEDAR RAPIDS, IA 52406	
Batteries - Nickel Cadmium (N	23	0	19.4	42.8	29113	10/9/2009	TAYLOR INDUSTRIES 4360 112TH ST URBANDALE, IA 50322	
Batteries - Nickel Cadmium (N	32	0	25.0	55.1	29186	10/22/2009	OMEGA CABINETS 1205 PETERS DRIVE WATERLOO, IA 50703	
Batteries - Nickel Cadmium (N	21	0	17.7	39.0	29168	10/21/2009	EATON CORPORATION* 1600 AIRPORT ROAD SHENANDOAH, IA 51601	



## A-TEC Recycling Inc. BATTERY Drum Report For Manifest 9019

Drum #	Vendor	Vendor Drum Number	Shipped	Ship Date	Measured Weight	Manifest
6946	INTERCO		<input checked="" type="checkbox"/>	12/7/2009	210.6	09019

Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date	Generator
Batteries - Nickel Cadmium (N	22	0	5.3	11.7	29175	10/22/2009	JOHN DEERE CYLINDER DIVISION 909 RIVER DRIVE MOLINE, IL 61265
	250		178.0	392.5			

\*\*\* Measured weight &lt;&gt; 23 kilos from actual weight - OFF BY - 32.6

6954	INTERCO				<input checked="" type="checkbox"/>	12/7/2009	216.6	09019
Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date	Generator	
Batteries - Nickel Cadmium (N	120	0	52.2	115.1	29149	10/19/2009	JCCC 12345 COLLEGE BLVD OVERLAND PARK, KS 66210	
Batteries - Nickel Cadmium (N	75	0	15.8	34.8	29249	11/4/2009	LINCOLN CSD 505 SOUTH STREET LINCOLN, NE 68502	
Batteries - Nickel Cadmium (N	22	0	4.3	9.5	29232	10/30/2009	CLOW VALVE COMPANY 902 SOUTH 2ND ST OSKALOOSA, IA 52577	
Batteries - Nickel Cadmium (N	43	0	33.7	74.3	29174	10/22/2009	JOHN DEERE SEEDING DIVISION 501 RIVER DRIVE MOLINE, IL 61265	
Batteries - Nickel Cadmium (N	33	0	38.2	84.2	29231	10/30/2009	CLOW VALVE COMPANY 1607 17TH AVE E OSKALOOSA, IA 52577	
Batteries - Nickel Cadmium (N	83	0	59.6	131.4	29245	11/2/2009	REGIONAL COLLECTION CENTER 1105 PRAIRIE DRIVE SW BONDURANT, IA 50035	
		376	203.8	449.4				

6961	INTERCO																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			</
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## A-TEC Recycling Inc. BATTERY Drum Report For Manifest 9019

Drum #	Vendor	Vendor Drum Number		Shipped	Ship Date	Measured Weight	Manifest
6961	INTERCO			<input checked="" type="checkbox"/>	12/1/2007	4,988.6	09019
Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date	Generator
Batteries - Lead Acid (lbs)	4	0	4.2	9.3	29218	10/28/2009	PRINCE AGRI PRODUCTS 2823 7TH AVE MARION, IA 52302
Batteries - Lead Acid (lbs)	0	0	62.9	138.7	29276	11/10/2009	GRINNELL MUTUAL REINSURANC 4215 HIGHWAY 146 GRINNELL, IA 50112
Batteries - Lead Acid (lbs)	4	0	5.0	11.0	29232	10/30/2009	CLOW VALVE COMPANY 902 SOUTH 2ND ST OSKALOOSA, IA 52577
Batteries - Lead Acid (lbs)	2	0	5.2	11.5	29234	10/30/2009	OSKALOOSA FOODS 546 9TH AVE E OSKALOOSA, IA 52577
Batteries - Lead Acid (lbs)	4	0	6.1	13.5	29230	10/30/2009	PRAXIS 2908 NORTH COURT ROAD OTTUMWA, IA 52501
Batteries - Lead Acid (lbs)	3	0	3.7	8.2	29201	10/26/2009	VAN DIEST SUPPLY CO 1434 220TH STREET WEBSTER CITY, IA 50595
Batteries - Lead Acid (lbs)	22	0	56.6	124.8	29317	11/18/2009	PARKER HANNIFIN HIGHWAY 48 NORTH RED OAK, IA 51566
Batteries - Lead Acid (lbs)	47	0	57.3	126.3	29329	11/19/2009	SNAP - ON TOOLS CORPORATION 2600 US HWY 18 EAST ALGONA, IA 50511
Batteries - Lead Acid (lbs)	54	0	74.2	163.6	29258	11/5/2009	AMES SCHOOL DISTRICT 1621 WILSON AMES, IA 50010
Batteries - Lead Acid (lbs)	17	0	49.2	108.5	29278	11/10/2009	HEINZ 1357 ISETT AVE MUSCATINE, IA 52761
Batteries - Lead Acid (lbs)	15	0	12.0	26.5	29249	11/4/2009	LINCOLN CSD 505 SOUTH STREET LINCOLN, NE 68502
Batteries - Lead Acid (lbs)	2	0	2.4	5.3	29310	11/16/2009	US BANK 520 WALNUT STREET DES MOINES, IA 50309
Batteries - Lead Acid (lbs)	11	0	48.6	107.2	29309	11/17/2009	MADISON COUNTY MEM HOSP 300 HUTCHINGS WINTERSET, IA 50273
Batteries - Lead Acid (lbs)	2	0	38.0	83.8	29308	11/16/2009	ALLIANT ENERGY 4282 SULLIVAN SLOUGH ROAD BURLINGTON, IA 52601
Batteries - Lead Acid (lbs)	68	0	233.6	515.1	29228	10/29/2009	UNITED STATES POSTAL SERVIC 4900 SPEAKER ROAD KANSAS CITY, KS 66106
Batteries - Lead Acid (lbs)	7	0	5.9	13.0	29239	11/2/2009	V.T. INDUSTRIES 1000 INDUSTRIAL PARK HOLSTEIN, IA 51025



## A-TEC Recycling Inc. BATTERY Drum Report For Manifest 9019

Drum #	Vendor	Vendor Drum Number	Shipped	Ship Date	Measured Weight	Manifest	
6961	INTERCO		<input checked="" type="checkbox"/>	12/1/2007	4,988.6	09019	
Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date	Generator
Batteries - Lead Acid (lbs)	28	0	48.6	107.2	29259	11/5/2009	NELSON ELECTRIC COMPANY 239 SOUTH BELL AVENUE AMES, IA 50010
Batteries - Lead Acid (lbs)	7	0	13.3	29.3	29238	11/2/2009	BUENA VISTA UNIVERSITY 610 WEST 4TH STREET STORM LAKE, IA 50588
Batteries - Lead Acid (lbs)	18	0	39.0	86.0	29241	11/2/2009	NORTHWESTERN COLLEGE 415 8TH ST SE ORANGE CITY, IA 51041
Batteries - Lead Acid (lbs)	2	0	3.4	7.5	29291	11/12/2009	STITZELL ELECTRIC 107 12TH STREET DES MOINES, IA 50309
Batteries - Lead Acid (lbs)	6	0	21.2	46.7	29257	11/5/2009	COLO NESCO SCHOOLS 400 LATROBE MCCALLSBURG, IA 50154
Batteries - Lead Acid (lbs)	604	0	1,616.3	3,563.9	29287	11/13/2009	JOHN DEERE PRODUCT ENGINEER WATERLOO, IA 50704
Batteries - Lead Acid (lbs)	4	0	11.2	24.7	29279	11/10/2009	SSAB 1770 BILL SHARP BOULEVARD MUSCATINE, IA 52761
Batteries - Lead Acid(Car batt)	58	0	1,011.6	2,230.6	29279	11/10/2009	SSAB 1770 BILL SHARP BOULEVARD MUSCATINE, IA 52761
Batteries - Lead Acid (lbs)	58	0	65.8	145.1	29285	11/12/2009	CEDAR RAPIDS/ LINN COUNTY SC 1954 COUNTY HOME ROAD MARION, IA 52302
Batteries - Lead Acid (lbs)	63	0	175.2	386.3	29328	11/19/2009	FRIENDSHIP HAVEN 420 SOUTH KENYON ROAD FORT DODGE, IA 50501
Batteries - Lead Acid (lbs)	42	0	76.8	169.3	29335	11/19/2009	MERCY HOSPITAL 201 8TH AVENUE SOUTHEAST OELWEIN, IA 50662
Batteries - Lead Acid (lbs)	11	0	9.2	20.3	29281	11/17/2009	WELLS MANUFACTURING L P 2700 DEWEY ROAD CENTERVILLE, IA 52544
Batteries - Lead Acid (lbs)	16	0	24.6	54.2	29330	11/19/2009	A TO Z DRYING 215 STATE STREET OSAGE, IA 50461
Batteries - Lead Acid (lbs)	2	0	6.4	14.1	29333	11/20/2009	TOWER PARK/ DBSI REALTY COF 201 TOWER PARK WATERLOO, IA 50701
Batteries - Lead Acid (lbs)	30	0	38.4	84.7	29326	11/19/2009	PRINCIPAL 111 WEST STATE STREET MASON CITY, IA 50000
Batteries - Lead Acid (lbs)	8	0	13.8	30.4	29289	11/13/2009	SARTORI MEMORIAL HOSPITAL, I 515 COLLEGE CEDAR FALLS, IA 50613

## A-TEC Recycling Inc. BATTERY Drum Report For Manifest 9019

Drum #	Vendor	Vendor Drum Number	Shipped	Ship Date	Measured Weight	Manifest	
6961	INTERCO		<input checked="" type="checkbox"/>	12/1/2007	4,988.6	09019	
Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date	Generator
Batteries - Lead Acid (lbs)	9	0	21.3	47.0	29288	11/13/2009	COMMUNITY ELECTRIC, INC. 1510 FALLS AVENUE WATERLOO, IA 50701
Batteries - Lead Acid (lbs)	11	0	34.2	75.4	29305	11/16/2009	GE CAPITAL 1010 THOMAS EDISON BLVD SW CEDAR RAPIDS, IA 52404
Batteries - Lead Acid (lbs)	4	0	7.9	17.4	29338	11/20/2009	BLANK PARK ZOO 7401 SW 9TH DES MOINES, IA 50315
Batteries - Lead Acid (lbs)	56	0	50.9	112.2	29245	11/2/2009	REGIONAL COLLECTION CENTER 1105 PRAIRIE DRIVE SW BONDURANT, IA 50035
	1,446		4,707.5	10,380.0			

\*\*\* Weight exceeds 340.1 kilos

\*\*\* Measured weight &lt;&gt; 23 kilos from actual weight - OFF BY - 281.1

6967	INTERCO																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
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**A-TEC Recycling Inc. BATTERY Drum Report For Manifest 9019**

Drum #	Vendor	Vendor Drum Number	Shipped	Ship Date	Measured Weight	Manifest
6967	INTERCO		<input checked="" type="checkbox"/>	12/7/2009	221.6	09019

Description	Quantity	Length	Weight - Kilos	Weight - Lbs	Bol Number	Bol Date
Batteries - Nickel Cadmium (N	75	0	51.4	113.3	29262	11/4/2009
Batteries - Nickel Cadmium (N	19	0	4.1	9.0	29279	11/10/2009
Batteries - Nickel Cadmium (N	45	0	8.7	19.2	29326	11/19/2009
	283		185.8	409.7		

**Generator**

KS AIR NATIONAL GUARD  
5920 SE COYOTE DR  
TOPEKA, KS 66619

**SSAB**

1770 BILL SHARP BOULEVARD  
MUSCATINE, IA 52761

**PRINCIPAL**

111 WEST STATE STREET  
MASON CITY, IA 50000

\*\*\* Measured weight <> 23 kilos from actual weight - OFF BY - 35.8

Total all drums: 2,693 5,483.4 12,090.9

## Appendix 1-1

### DATA GATHERING WORKSHEET AND CHECKLIST INSTRUCTIONS AND KEY

1. Complete all items on the applicable data gathering worksheet and checklist in a neat and legible fashion.
2. All responses will be based on the inspector's knowledge and best judgement and information obtained from facility the representative(s) at the time of the inspection.
3. A (✓) mark should be used to mark the all boxes (□) and will indicate the choice made or the action completed.
4. The Records Review Worksheet and Checklists and the Visual Review Worksheet and Checklists each have a key below the tables. Use this key when filling out these forms.
  - a. Items which are shaded gray on the worksheets and checklists are considered high priority items during inspections and should always be completed.
  - b. On the top of the worksheets and checklists are a group of boxes which represent the generator status of the facility and whether or not the facility is subject to interim status or permit requirements. The appropriate box should be checked.
5. The inspector should pay special attention to the questions contained in this box and make sure that they are able to answer them as relates to inspection documentation.

**DOCUMENTATION: *HOW* are the facts known? *WHO* said what? *WHEN* did it happen? *HOW* long did it happen? and *WHAT PROOF WAS OBTAINED?***

6. Each of the forms has a space at the bottom to indicate the Attachment number and page when the form is included in the report. The attachment number and page should be used when referencing information contained on the form in the inspection report.

## Appendix 1-2

### PRE-INSPECTION ITEMS TO CHECK

General Equipment:	- hardhat - safety glasses - camera - calculator - GPS unit - post-its - coveralls - film - pH paper	- rubber boots - tape measure - notebook - compass - tape recorder - safety gloves - safety boots - ice chest - batteries	- safety shoes - back-up camera - flashlight - binoculars - pens/markers - winter gloves - ear plugs - coat - respirator
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Special Equipment?: \_\_\_\_\_

Paperwork:	- NOV, CBI & Rec. for Doc. forms - Reference Information - Data Collection Worksheets	- Notification forms - Regulations (Federal/State)	- Multi-Media form - Facility Files
Items Needed:	- Load Camera - Change Phone Message - Change Phone Message	- Credentials - Car Book/Keys/Credit Card - Sign-out On Board Considerations?	- Daily Planner - Business Cards - Special Health or Safety

Notes: \_\_\_\_\_



## Appendix 1-3

Facility: A-TEC Recycling

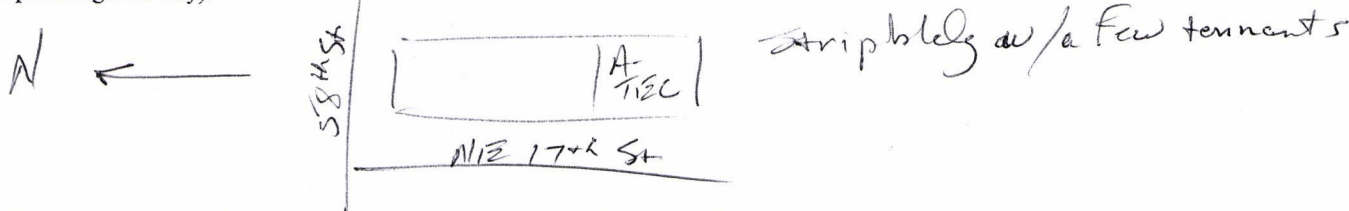
Date: 2/4/10

Arrival time: ~ 9:30 am

### DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☐ No

- |                    |                    |                        |                       |
|--------------------|--------------------|------------------------|-----------------------|
| - Containers       | - Tanks            | - Processing Equipment | - Loading Areas       |
| - Unloading Areas  | - Security Devices | - Open Drums           | - Stressed Vegetation |
| - Unusual Staining | - Unusual Odors    | - Obvious Discharges   | - Improper Disposal   |
| - Safety Concerns  | - Other Concerns   |                        |                       |

## Appendix 1-4

### SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☒ No

2. Facility Representative(s): Larry Young Title: Co-Owner & President  
Dan Leach Title: Driver  
Title: \_\_\_\_\_

3. Does representative have intimate knowledge of all waste management practices? ☐ Yes ☐ No

How long in position? > 10 yr

4. Introduction:

- ☒ Presented credentials
- ☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☒ Verified presence at correct facility (checked address/I.D. #)
- ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒ Explained the purpose, scope, and order of the inspection
- ☒ Completed Multimedia screening checklist
- ☒ Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☒ Provided SBRFA
- ☐ Obtained GPS reading - equip. not working
- ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☒ By facility representative or Other (name): \_\_\_\_\_

☐ No - Access denied. Name of person denying access: \_\_\_\_\_

Time of denial: \_\_\_\_\_

Reason for denial, or limitations placed on access:

## FACILITY BACKGROUND WORKSHEET

Date facility began operating: 1995 Number of employees: 9

Number of shifts/hour worked: 8 hr/day Number of days worked per week: 5 d/wk

Size (sq. ft., how divided): two adjoining parts of bldg ~6,000 ft<sup>2</sup> each. tenant in a bldg w ~33K ft<sup>2</sup> total. N. space is warehouse & employee area. S. space is office/del. very  
& processing

Property owner and facility operator the same? ☐ Yes ☒ No

L. Young said they are buying bldg & property on contract

2. Major products or services provided: UW transporter # dest fac (recycle lamps)  
lamps collected by A-TEC or received via other transporter from handler. Lamp boxes  
opened, counted, recorded & staged for crushing. Containers left open after counting.

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process	Waste Stream(s)
lamp recycling	calcium phosphate powder ✓ det. end caps glass carbon filters & hepa filters ✓ det.
cardboard	recycled

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.



6. Verified/compared above information with facility Notification Form: ☒ Yes ☐ No

7. **GENERATOR STATUS:** (based on records review)

☒ Non-generator

☐ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)

☐ SQG (100-1000kg/mo and accumulate <6000kg)

☐ LQG (>1000kg/mo)

Is facility's status solidly within above category? ☒ Yes ☐ No  
(If not carefully verify status and document) *appears so*

8. **TSD STATUS:**

☐ Treatment

☐ Storage

☐ Disposal

Note: Types of units, number of units, capacities, processes, etc:

*N/A*

9. Resolved questions from Pre-Inspection Worksheet?

☒ Yes

☐ No

☐ No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet?

☒ Yes

☐ No

☐ No Questions

11. Requested site map or diagram to identify all observations?

☒ Yes

☐ None Available

# Appendix 1-6

## GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: Waste particulate (lamp phosphor) from lamp processing (recycling)  
 FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☒ Testing

Documentation: have test result - copy

GENERATING PROCESS: particulate collected from 1 totally enclosed crusher

GENERATION RATE: ~25,000 lb/mo.

ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☒ Visually inspected

2009 ~ 900 K lamps processed (fluor. & HID). L. Young said U.W. lamps are ~95% of biz & process lamps w/in a couple days of receipt. L.Y. said crusher run about 45 wks/yr total => = 225 days (ie not operated ea day)

OFF-SITE MANAGEMENT/DISPOSITION: ship to Bethlehem Apparatus Co. in Hellerton, PA for retort recovery of metals

2. WASTE STREAM: Filter waste

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: dust test

GENERATING PROCESS: 1 hepa filter unit (12 cartridges) followed by carbon filter. Crusher exhaust air.

GENERATION RATE: hepa - ~250 lb ea 4-6 mo; carbon media ~500 lb ea 2.5-3 yr

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION: added to waste particulate sent to Bethlehem for recovery

3. WASTE STREAM: crushed glass

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☐ Product knowledge ☒ Process knowledge ☒ Testing

Documentation: dust test & glass test

GENERATING PROCESS: lamp crusher

GENERATION RATE: ~40,000 lb/mo.

ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☒ Visually inspected

accumulate in ~1 yd<sup>3</sup> tubs

OFF-SITE MANAGEMENT/DISPOSITION: give or sell to const. contractors for fill or concrete mix



## Appendix 1-6

## GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: metal end capsFACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: lamp crusherGENERATION RATE: ~15,000 lb/yr.ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☒ Visually inspectedOFF-SITE MANAGEMENT/DISPOSITION: sell to Alter Metals in Des Moines for scrap value2. WASTE STREAM: UW batteries; Pb-acid, Ni-cad, Lithium-+, alkalineFACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: UWDETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: collect or delivered from generators (handlers)GENERATION RATE: not determined for alkaline. Pb-acid ~75K lb/yr Ni-cad ~9.7K lb/yr Li-+ ~35K lb/yrON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☒ Visually inspected2 crates w sealed Pb-acid batteries not marked.OFF-SITE MANAGEMENT/DISPOSITION: send UW batteries (non-Hg) to Interco Trading Co. in Meadison, IL for recycling. Hg batteries to Bethlehem for recovery3. WASTE STREAM: UW Hg containing equip.FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: UWDETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: collect/delivered from handlersGENERATION RATE: ~1400 lb/yr (incl. Hg batteries)ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☒ Visually inspectedOFF-SITE MANAGEMENT/DISPOSITION: ship to Bethlehem for recycling

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: Spent PPE (gloves, masks, sleeves, some aprons & resp. cartridges)

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: Sometimes worn especially when loading crusher

GENERATION RATE: - 200 lb/yr.

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected ☒ Storage ☐ Visually inspected

none observed

OFF-SITE MANAGEMENT/DISPOSITION: added to UW Hy equip. sent to Bethlehem & recycle

2. WASTE STREAM: spent Fixture ballasts

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: not determined

DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: collected or delivered from generators

GENERATION RATE: not determined

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected ☒ Storage ☐ Visually inspected

briefly

OFF-SITE MANAGEMENT/DISPOSITION: ship to Veolia Tech. Soln, LLC in Phoenix, AZ & recycle

3. WASTE STREAM: \_\_\_\_\_

FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: \_\_\_\_\_

DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation: \_\_\_\_\_

GENERATING PROCESS: \_\_\_\_\_

GENERATION RATE: \_\_\_\_\_

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected ☐ Storage ☐ Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION: \_\_\_\_\_



## K. Universal Waste (UW)

### 1. Universal Waste Generated

Waste: Fluorescent & HID Lamps Batteries Hg-containing equip. and/or thermostats Pesticides

Qty. Generate/year: see gen waste sheets

Qty. Presently in storage: nd

Accumulation Time: 2-3 days

Present Disposal Method: crushing recycle ship to recovery/recycle facilities

2. Person(s) responsible for universal waste management: L. Young

3. Does the universal waste handler accumulate (collectively) 5,000 kilograms or more at any time (40 CFR 273.9)? If YES, a large quantity handler (LQH), go on and also refer to checklist in Appendix 2-2. If NO, a small quantity handler (SQH), go on.

Assessing Requirements Common to Universal Waste SQH & LQH (40 CFR 273 Subpart B & C, respectively): no record found at 5K kg

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Disposal of UW is not occurring-273.11(a)/273.31(a)	
2.		Diluting or treating universal waste is not occurring, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)-273.11(b)/273.31(b)	crush lamps
3.		Has the LQH notified of UW management?-273.32 (a)(1) (not required for SQH)	have notified as processor
4.	✓	Has UW been shipped to another UW handler, a designated facility, or a foreign destination?-273.18(a)/273.38(a) If not, see Appendix 2-2 for off-site shipments	
a.		Does LQH have documentation tracking shipments?-273.39 (not required for SQH-273.19)	have records reg'd of dest. facility reviewed many random records got some copies; appear ok
5.		UW package, container, tank, vessel or transport vehicle is marked or labeled-273.14/273.34-as follows:	
a.		"Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"-273.14(a)/273.34(a)	26 rates not marked. marked during CE I
b.		For recalled universal waste pesticides; "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)," and the label that was on or accompanied the product as sold or distributed, or if the label is not available or not feasible to use, the appropriate DOT label as identified in 49 CFR 172-273.14(b)/273.34(b)	
c.		For unused pesticide products as described in 40 CFR 273.3(a)(2): (1) the label that was on the product when purchased, if still legible; (2) if using that label is not feasible, the appropriate label required under DOT regulation 49 CFR Part 172; (3) if using either of the previously described labels is not feasible, another label prescribed or designated by the waste pesticide collection program administered or recognized by a state; and (4) the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"-273.14(c)/273.34(c)	
d.	✓	"Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"-273.14(d)(1)/273.34(d)(1) <u>Thermostats may be labeled:</u> "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"-273.14(d)(2)/273.34(d)(2)	
e.		"Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"-273.14(e)/273.34(e)	lamps not closed after opened & counting & recording. Not sure if all marked, could not see all container sides/bottoms.

6.	<p>Accumulation Time Limits – 273.15/273.35</p> <p>A UW handler may accumulate universal waste <b>no longer than a year</b> from the date of generation or receipt from another handler, unless the requirements of paragraph 273.15(b) are met, as follows:</p>	no records or labeling over 1 yr.
a.	<p>Storage over one year is solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal <u>and</u> the handler provides proof of this – 273.15(b)/273.35(b)</p> <p>For further requirements of UW retention time documentation, see Appendix 2-2.</p>	
7.	<p>Employee Training – 273.16/273.36</p> <p>The UW handler must inform all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.</p>	
8.	<p>Response to Releases – 273.17/273.37 – Did you observe any releases or did any releases occur? – if yes, see Appendix 2-2.</p>	
9.	<p>Handlers of universal waste that self-transport universal waste off-site become a universal waste transporter for those self-transportation activities and must comply with the transporter requirements of subpart D of this part while transporting the universal waste – 273.18(b)/273.38(b) – and see Appendix 2-2.</p>	transporter records looked over reviewed random & copied some typical



## Appendix 1-10

### EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
  - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
  - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.
- ☐ Identified/verified violations from previous inspection were corrected (if applicable)
- ☒ Addressed all unresolved inspection related issues
- ☒ Summarized findings and observations for the facility representatives
- NOV issued? ☒ Yes ☐ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations
- ☒ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☒ Prepared Document Receipt form
3. Specific information requested from facility? ☐ Yes ☒ No

4. Facility appears to have awareness of RCRA regulations? ☒ Yes ☐ No

5. Facility has its own environmental staff? ☒ Yes ☐ No *Larry Young*

6. Facility has copy of applicable regulations? ☒ Yes ☐ No

7. Attitude and demeanor of facility representative(s); ☒ OK ☐ Not OK

8. Notes/Observations:

## PHOTO LOG

**Facility Name / City:** A-TEC Recycling Co.

Des Moines, Iowa

**Facility ID #:** IA0000109827

**Date :** February 4, 2010

**Photographer:** David N. Whiting

**Type of Camera:** Canon Power Shot G5, Serial #: 6924106034

**Digital Recording Media:** Flashcard

**All digital photos were copied by:** David N. Whiting on 02/16/08

**All digital photos were copied to:** CD-R

**Original copy is stored in:** CD-R. Digital photos were downloaded to CD-R by David N. Whiting. No changes were made in the original image files prior to storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (IMG_XXX.jpg)	Description
1	David N. Whiting	02/04/10	1:06 pm	0784.jpg	Used lithium-mercury batteries in a 55-gallon drum.
2	David N. Whiting	02/04/10	1:06 pm	0785.jpg	Used batteries in the drum seen in photo #1.
3	David N. Whiting	02/04/10	1:07 pm	0786.jpg	Used, sealed lead-acid batteries in containers. The two wooden crates are not marked identifying contents
4	David N. Whiting	02/04/10	1:07 pm	0787.jpg	Rear of the used lamp processing equipment. Ground glass is accumulated in the rectangular metal tub on the right.
5	David N. Whiting	02/04/10	1:14 pm	0788.jpg	Front (feed end) of the used lamp processing equipment.
6	David N. Whiting	02/04/10	1:14 pm	0789.jpg	Front (feed end) of the used lamp processing equipment. Air filter equipment is located to the right of the processing machine, in blue metal housings.
7	David N. Whiting	02/04/10	1:16 pm	0790.jpg	Used lamps in staging area before processing. The containers are not closed.
8	David N. Whiting	02/04/10	1:17 pm	0791.jpg	Used lamps in staging area before processing. The containers are not closed.
9	David N. Whiting	02/04/10	1:23 pm	0792.jpg	Used lamps in staging area before processing. The containers are not closed.
10	David N. Whiting	02/04/10	4:45 pm	0793.jpg	The two wooden crates of used lead-acid batteries seen in photo # 3, were marked during the CEI.
11	David N. Whiting	02/04/10	4:45 pm	0794.jpg	The two wooden crates of used lead-acid batteries seen in photo # 3, were marked during the CEI.



Photo 1      Used lithium-mercury batteries in a 55-gallon drum.



Photo 2      Batteries in the drum seen in photo # 1.



Photo 3      Used sealed lead-acid batteries in containers. Wooden crates not marked.

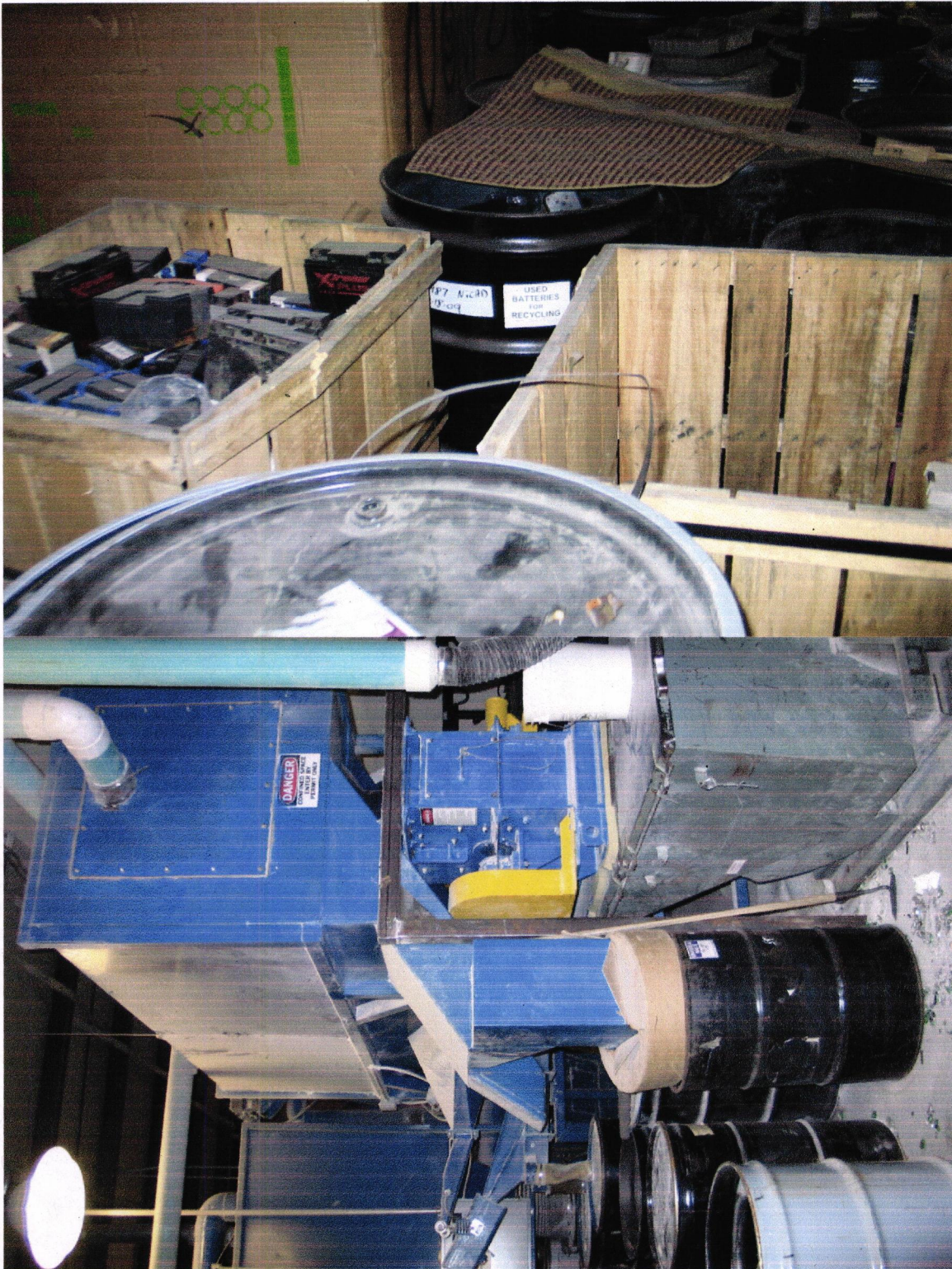


Photo 4      Rear of the used lamp processing equipment.



Photo 5

Front end of the used lamp processing equipment.



Photo 6

Front of the lamp processing equipment. Air filtering devices on the right.



Photo 7      Used lamps in staging area before processing. Containers are not closed.



Photo 8      Used lamps in staging area before processing. Containers are not closed.



Photo 9      Used lamps in staging area before processing. Containers are not closed.



Photo 10      Wooden crate of sealed lead-acid batteries marked during the CEI.



Photo 11      Wooden crate of sealed lead-acid batteries marked during the CEI.





# DOCUMENT CONTROL CHECK SHEET

Media:

Air RCRA Water Other

Date of Inspection: 2/4/10

Facility/Site Name and Location: A-TEC Recycling, Inc.

IA KSMONE

Des Moines

8

## Document

Yes No NA

Final Report w/attachments

52 Pages

☒ ☐ ☐

Field Sheets

\_\_\_\_\_ Pages

☐ ☐ ☒

Chain-of-Custody Records

\_\_\_\_\_ Pages

☐ ☐ ☒

Field Notes

\_\_\_\_\_ Pages

☐ ☐ ☒

Analytical Data Sheets

\_\_\_\_\_ Pages

☐ ☐ ☒

Photographic Negatives

\_\_\_\_\_ Pages

☐ ☐ ☒

Photographs (not included w/report)

\_\_\_\_\_ Pages

☐ ☐ ☒

Pre-inspection Packet

\_\_\_\_\_ Pages

☐ ☐ ☒

Other Documents (list below)

☒ ☐ ☐

Inspector worksheet

2 Pages

CD w/CEI photos

1 CD Pages

\_\_\_\_\_ Pages

(Note: If additional space is needed to list specific documents, use the reverse side of this page.)

## CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

[Signature]  
Activity Leader's Signature

2/18/10  
Date Signed